

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Council Bluffs Comm School District (14760000)
SNP - Review ID: 4131

Program Year: 2017
Month of Review: March
Lead Reviewer: Janice Steffen
Org Representative(s): Virginia Bechtold

Site - Level Findings: Thomas Jefferson High School (0109)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
400 - Meal Components and Quantities - Lunch	V-0400	Chili offered with French Fry Bar on 5/1/17 does not provide 2 M/MA as listed on the standardized recipe. The CN label for Beef Crumbles states that 2.4 ounces credit for 2 M/MA. Therefore, the 4 oz serving of this recipe does not credit as listed. Technical Assistance provided to check all recipes using Beef Crumbles.	For your response, submit the revised recipe which shows either the M/MA adjustment or the amount of beef crumbles used in the chili.	
400 - Meal Components and Quantities - Lunch	V-0400	CN labels are not available for items served week of March 13 which was the focus week of the review. Distributor Information Sheets are not an acceptable means of documentation to verify crediting of menu items.	For your response, state your plan for maintaining acceptable documentation to verify how menu items credit and submit CN label or product formulation documentation for the following three items: 1. Strawberry Delight (breakfast item served 3/13/17 and provided at Afterschool Snack on 5/2/17), 2. Spicy Bean Burger (served 3/15/17) and 3. Snack'n Waffles (breakfast items served 3/13/17).	
400 - Meal Components and Quantities - Lunch	V-0400	Food Production Records for March 14 - 16 appear to be insufficient for grain for Chef Salad and Yogurt Meals which are packaged with only one grain. During the on-site review, we recognize this has been corrected and additional grains were available during our lunch observation. Food Production Records are being revised to better capture all grains offered.	For your response, submit completed TJHS Food Production Records from one week in May. Describe your plan for revising Food Production Records using the Checklist that was provided as a guideline.	
1100 - Smart Snacks in School	V-1100	Smart Snacks documentation is not acceptable from distributor. Snacks should be run through Alliance calculator and printouts maintained. Recommend printouts be maintained at both district office and TJHS. Documentation for Hot Chocolate served at TJHS snack counter was not available. During the review it was discovered it was not compliant and product was discontinued.	For your response, share your plan for organizing documentation for Smart Snacks and how you will plan to train staff who sell a la carte at TJHS.	

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Council Bluffs Comm School District (14760000)
SNP - Review ID: 4131

1700 - Afterschool Snack	V-1700	Afterschool Snack Program findings: 1. Onsite Monitoring was not completed within first 4 weeks. The SFA is to conduct self-monitoring twice per year; the first review during the first four weeks of the program. 2. Production Records are not completed daily. 3. The counting system may not consistently be at the point of service.	For your response, 1. Complete and submit the second required review for TJHS. State your understanding that the self-monitoring must be completed by SFA two times per year and the first must occur within the first 4 weeks of snack service. 2. Submit one completed food production record (FPR) and a description of how FPR will be implemented at TJHS and other snack sites. 3. Describe your revised counting system so students are counted at the point that snacks are provided to each student.	
--------------------------	--------	--	---	--

Site - Level Findings: College View Elementary (0427)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
400 - Meal Components and Quantities - Breakfast	V-0400	Two breakfast meals were claimed that did not include fruit because point of sale was at the beginning of the line and no staff were assigned to assure that a student took a fruit from the food bar at the end of the line.	Describe how SFA will assure that all breakfasts claimed for reimbursement include the required 1/2 cup of fruit.	

Site - Level Findings: EDISON ELEMENTARY (0445)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
500 - Offer versus Serve	V-0500	No signage was present at breakfast. Sign should 1. Indicate the daily breakfast menu 2. Explain the requirement of Offer vs. Serve to select three items 3. State the requirement for students to select 1/2 cup fruit or 1/2 cup 100% fruit juice or 1/2 cup vegetable.	Post signage and explain where you put it or attach a picture of sign.	

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
1000 - Local School Wellness Policy	V-1000	<p>WELLNESS: The district is required to invite stakeholders to participate in the wellness committee and/or have documentation of the invitation. Stakeholders should include: parents, teachers of physical education, school administrators, students, school health professionals, general public, school food service and school board members. Attendance records and meeting minutes should be kept.</p> <p>It is required to review the policy once every three years, the posted policy was last reviewed on July 26, 2011. (Reviewed in March 2017.)</p> <p>The district is required to complete an assessment of the wellness policy every three</p>	Submit a plan on how you will make the updated Wellness Policy and Assessment available to the public. Include a plan on how you will better utilize the Wellness Committee to participate in the process of setting goals, assessing achievement of goals and reviewing the policy.	

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Council Bluffs Comm School District (14760000)
SNP - Review ID: 4131

		years and make the results public. Assessment objectives should be set and reviewed by the Assessment Committee.		
1500 - Reporting and Recordkeeping	V-1500	The SFA was unable to produce the list of students to validate CEP numbers. This finding is related to the finding on Question 2115	Attach the final list of students used to establish your CEP eligibility/ratios. State your intentions to keep all records pertaining to the Child Nutrition Program for 3 years after the final claim for reimbursement for the fiscal year or until resolution of any audits.	
2100 - Special Provision Options	V-2100	Kirn Jr. High was added to Group 1 in SY 2016, but because of the way data was entered into IowaCNP, the ISP from 2014 is being used for the original schools and the ISP for 2015 is being used for Kirn.	Work with Administrative Consultant at Iowa Department of Education to use either 2014 or 2015 ISP for all schools in Group 1. Fiscal action is dependent on final calculated percentage.	
2100 - Special Provision Options	V-2100	Although the report used to complete the CEP eligibility in April of 2014 and 2015 appears to be accurate, the original lists to support the numbers were not available. Electronic lists generated now do not match the original numbers.	Attach the final list of students used to establish your CEP eligibility/ratios. Administrative Consultant at Department of Education will work with you to establish verified claiming percentages. Fiscal action is dependent on final verified percentage.	

Org - Level Technical Assistance

Area	Question	Comments
100 - Certification and Benefit Issuance	133 Are the Direct Certification lists retained on file by the SFA? If NO, explain.	The initial annual July Direct Certification list downloaded into NutriKids had not been kept in an electronic or paper format in the past making verification of ISP reliant on lists that could be generated from state office. This was corrected for the July 2016 list.
300 - Meal Counting and Claiming	314 All Schools for the Review Period	It was noted that claim revisions can be made by individual only, (not based on summary reports run at a later date), back to the date of the data file (identified on the download) or received date (no back dating) for applications (which should be processed with in 10 days).
300 - Meal Counting and Claiming	314 All Schools for the Review Period	It was noted that it is an unacceptable practice to
700 - Resource Management		1). The most restrictive purchase threshold must be used. For micro-purchases, the federal threshold of \$3,500 should be used. The federal threshold is more restrictive than local threshold of \$5,000. 2). The procurement questions completed identified additional purchases/services which were not included on the procurement plan. Some of these are Point-of-Service software update contract and equipment repair contract. 3). The Prime Vendor contract award type is stated as IFB-Fixed Price. In a fixed price contract, the price of the goods and service remain "fixed" for the entire contract period. There are no rebates. If manufacturer rebates are received by the SFA, then the contract is a cost-reimbursable contract. Solicitations for cost-reimbursable contract must include provisions as provided in 210.21 NSLP Cost Reimbursable Contract Provisions checklist.

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Council Bluffs Comm School District (14760000)
SNP - Review ID: 4131

		The SFA and not the distributor is responsible for monitoring discounts, credits, and rebates on a cost-reimbursable contract.
800 - Civil Rights	809 Review program materials, do appropriate Program materials use the non-discrimination statement?	All program material must contain both Federal and Iowa non-discrimination statement OR the shortened statement. Provided Technical Assistance to the SFA where these statements can be located and that they need to be on all program materials including the monthly menu.
1400 - Food Safety	1400 a. Does the written food safety plan contain the required elements? If NO, identify which elements are missing.	The SFA should document menu items in the appropriate HACCP process category, Document Critical Control Points of food production, Monitor food safety, Establish and document corrective actions. SFA should monitor processes by reviewing recordkeeping, and the overall food safety program periodically. SFAs must Develop, Document, and Implement standard operating procedures (SOP), which are the foundation of a School Food Safety Program. SOPs are step-by-step written instructions for routine food service tasks. Each SOP should include instructions on monitoring, documentation and corrective action. Should also have a SOP on feeding in the classroom if applicable, and handling body fluids, Blood Born Pathogens, and Afterschool Snack, as part of feeding in the classroom.

Site - Level Technical Assistance Thomas Jefferson High School (0109)

Area	Question	Comments
300 - Meal Counting and Claiming - Lunch	325 b. Were the counts by category correctly used in the Claim for Reimbursement?	NutriKids Edit Check daily counts are not adjusted for claiming at 70.2% Free and 29.8% Paid. Edit Checks are required for CEP schools per CEP Planning and Implementation Guidance Sept 2016 p.39. Similar to non-CEP schools, when an edit check is exceeded, schools must provide documentation to demonstrate why (e.g., visiting students) or corrective action may be required.
400 - Meal Components and Quantities - Breakfast	411 a. Did the school comply with the planned menu for the review period?	Breakfast menu for TJHS is not posted on the website, nor available in a written form. As Breakfast Outreach is required, recommend posting menu on website along with other menus. Consider a implementing a cycle breakfast menu if this is helpful. Include daily menu on school monitors.
400 - Meal Components and Quantities - Lunch	401 Did all meals observed and counted for reimbursement for the day of review contain all of the required meal components?	One student had 1/2 dark green leafy salad for their vegetable on his tray. This credits for only 1/4 cup and was not a reimbursable meal. Recommend to include this example for nutrition staff training.
Dietary Specifications Assessment Tool - Lunch	1 Are specifications considered when purchasing menu items and condiments to limit the following?	Nutrition considerations for menu planning: French Fry Bar offers a very large portion of French fries; (8 oz) according to FPR. This is a large portion for sodium, fat and calories especially considering French Fry Bar menu is offered weekly. French fries were offered two other times during the focus week of review. Packaged Chips are offered as an additional grain during this day as well. Reminder to consider sodium, fat and calories when planning portions as well as how many times higher sodium/fat/calorie items are offered during the week.

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Council Bluffs Comm School District (14760000)
SNP - Review ID: 4131

Site - Level Technical Assistance College View Elementary (0427)

Area	Question	Comments
300 - Meal Counting and Claiming - Breakfast	318 At the selected school(s), does each type of meal service line as observed on the day of review provide an accurate count by eligibility category at the point of service (or approved alternate)?	It was observed that meals for students with special needs were sent to their room and entered into the electronic system before the students reached the building and then the plan was their names would be removed from the system if they did not participate. It was noted that a roster needs to be provided with the meals and meals served checked off, then entered into the system after served. This practice was adopted the next day. We also discussed assuring food safety and quality for those meals.
300 - Meal Counting and Claiming - Lunch	325 b. Were the counts by category correctly used in the Claim for Reimbursement?	It was noted that it is not an acceptable practice to revise claims for students whose eligibility status changes after the claiming period.
400 - Meal Components and Quantities - Breakfast	404 a. Is there signage explaining what constitutes a reimbursable breakfast to students?	Signage should remind students that they must take fruit or juice for breakfast.
500 - Offer versus Serve	500 Is Offer vs. Serve being implemented properly by the reviewed school?	Although offer vs. serve is not required in Elementary Schools, it was noted that only 16 trays out of 326 served on the day of the review appeared to have any green beans consumed from them. This means that about 15 cans of green beans were wasted. If offer vs. serve were used as allowed by USDA, students could choose any 1/2 cup of fruit or vegetable. We also discussed seasonings to make the green beans more appealing.

Site - Level Technical Assistance EDISON ELEMENTARY (0445)

Area	Question	Comments
400 - Meal Components and Quantities - Breakfast	403 a. Was fluid milk available in at least the two required varieties throughout the serving period on all meal service lines?	The SFA is required to offer a minimum of 2 types of low fat/no fat milk for students at breakfast and lunch. Only 1% white was being offered on the day of review.
500 - Offer versus Serve	500 Is Offer vs. Serve being implemented properly by the reviewed school?	Offer vs. Serve was not being done properly at Edison. Food was put on tray at breakfast and lunch, students picked up a full tray. Minimal options were available after picking up the tray to include fruit and vegetables. Under Offer vs. Serve, students should be given choices of what they want to take.
1400 - Food Safety	1402 Is a copy of the written food safety plan site specific and available at each school?	SFA has a food safety plan at central kitchen. Each site should have a copy of the food safety plan and standard operating procedures. Food safety plan was not present at Edison.
1900 - Fresh Fruit and Vegetable Program (FFVP)	1910 Did the FFVP meal service follow HACCP principles and applicable sanitation and health standards, including the handling of any left overs? If NO, explain.	School food service relies on the support of teaching and custodial staff to monitor distribution and service of FFVP snacks at the school. The single serve FFVP snacks are delivered in Rubbermaid totes with lids labeled for each classroom in the building. The Rubbermaid totes are washed and sanitized daily at the Nutrition Services warehouse and reused for next day's FFVP. Three observations were made that school food service are recommended to address with teaching staff: 1). The Rubbermaid totes are not used as intended. Instead contents of the totes are emptied by students into a classroom container (which may/may not be washed and sanitized daily); 2). Most students who picked up the snack did not take the nutrition education material placed in each tote.

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Council Bluffs Comm School District (14760000)
SNP - Review ID: 4131

		3). Teachers did not have students wipe their hands with hand sanitizer/baby wipes before snack service. Students were not provided with a napkin prior to snack service.
--	--	---

Org - Level Commendations

Description
BREAKFAST & SUMMER PROMOTION (1600): The SFA does an excellent job of promoting breakfast and Summer meal programs with reminder signs, announcements, newsletters, billboards and on the website.
CIVIL RIGHTS COMPLIANCE (800): Annual civil rights training was provided to staff and documented. Ethnic/racial information is collected and the form is completed. No discrimination was observed. The "And Justice for All" poster is visible to program participants.
MEAL COUNTING & CLAIMING (300): Meal counts during the on-site review were reasonable when compared to the (March) review month counts. Meal count totals for the month of March appeared accurate and complete. There was a point of service, POS, at the point where meals are served for all students observed. At the high school, students type in their number while at the elementary schools, students tell the POS operator their name, and it is recorded in the POS. Students are not overtly identified as free, reduced, or paid during the meal claiming process or during meal observation.
MEAL REQUIREMENTS & COMPONENTS: The Food Service Director, FSD, does an excellent job of menu planning and offering choices. There is good meal participation at all sites. High school students have at least three daily entrée choices, elementary students have at least two entrée choices per day, and all students have multiple fruit and vegetables to select from, many of which are fresh fruits and vegs. All meal components were available at the beginning of meal service on the days of observation and throughout meal service. Menus met weekly and daily meal pattern requirements for each age/grade group within the district and within each building. Standardized recipes are used for food production. There is regular staff training. Many low fat and low sodium food items were observed in storage. Signage was posted explaining what constitutes a reimbursable meal at lunch at all locations observed. A monthly menu is also posted. The elementary cafeterias were very well supervised, and staff interacted well with the students. Food service staff was polite and respectful to students, other staff, and each other. All students were observed to have a reimbursable meal during the day of the review, with an occasional friendly prompt by staff to take a serving of fruit.
On-site Monitoring (900): The on-site monitoring forms were completed for 100% of the SFA's sites for lunch and at least 50% were completed for breakfast prior to February 1st.
Procurement: The SFA has a written Procurement Plan for school food service purchases. The plan identified local thresholds for micro-purchase, small purchase, and formal procurement. For each procurement event listed in the plan, based on the estimated value the correct procurement method was selected. The SFA has a written Code of Conduct policy that states disciplinary actions including termination if policy is violated. The SFA provided signed debarment certification statements from current contracted vendors.
PROFESSIONAL STANDARDS (1200): The SFA followed regulations for the district's size category when hiring a new director to start in the 2017/2018 academic year. Tracking was provided that documents that the director received the required 12 hours of annual training, managers received the required 10 hours of training, full time employees have received 6 hours of training and all other staff have received at least 4 hours of annual training. (Or state that there is a plan, and they are on-track to complete hours by the end of the year.) There was a comprehensive list of all employees involved in child nutrition programs in the district, and training was correctly documented. All training hours are recorded on one central spreadsheet.
RESOURCE MANAGEMENT & RECORD KEEPING (700): The Resource Management section of the Off-Site Assessment tool was completed on time. March receipts that were reviewed, indicated appropriate and allowable expenditures. The Paid Lunch Equity, PLE, tool was completed. SFA has an efficient process of ordering, storing, preparing and delivering food within the district.
VERIFICATION (200): The correct number of applications were verified and were correctly selected from error prone applications. All income sources were verified with at least one month's income, and the process was completed on time. The application(s) selected for verification were confirmed prior to verification. The verification report was completed accurately and on time.
WATER (1300): Water was available to all students at the water fountain in the dining area during breakfast, lunch and throughout the day. Cups were provided.
WELLNESS POLICY (1000): The district has a current wellness policy on file. There are guidelines for foods sold on the campus and goals to promote student health, nutrition promotion, nutrition education, and physical activity. The latest assessment of the policy was available.

Site - Level Commendations Thomas Jefferson High School (0109)

Description

Iowa Department of Education
Bureau of Nutrition and Health Services
State Review Summary Report
Council Bluffs Comm School District (14760000)
SNP - Review ID: 4131

Food Service Staff is well trained in emergency management. Employees maintained a calm demeanor while directing students and visitors where to go and actions to take as an incident occurred during the on-site review.

TJHS nutrition staff are professional. They are observed to be welcoming, helpful, and encouraging to student customers. Many reimbursable menu options are available for students including a variety of fresh fruit and vegetables daily. During the week of March 13 there were 7 - 10 entree choices daily. Excellent food presentation. Broccoli or Spinach, Carrots, Tomatoes and Beans are on the salad bar daily. Menu signage is present. TJHS is a CEP school so all students eat free. Students were observed to take a reimbursable meal. A la carte items are sold in a separate window apart from the reimbursable meals. Most items meet Smart Snack guidelines. Excellent food safety practices observed to be practiced at this production kitchen. Standardized recipes are used and Food Production Records are completed by each department. An Afterschool Snack Program is offered to students participating in enrichment activities such as Environmental Club, Fitness Club and Tutoring.

Site - Level Commendations College View Elementary (0427)

Description

FOOD SAFETY AND SANITATION: Kitchen was immaculate. Last food licensing inspection had no findings and was posted where participants could see it. Temperature logs were completed daily. CUSTOMER SERVICE: Staff were efficient, friendly and welcoming to students. Appropriate accommodations are made for special diets and students with behavioral concerns who need to eat in classroom rather than cafeteria. Children are allowed choices at all meals. Late arriving students are served a bagged breakfast that can be taken to class. Civil Rights poster was displayed where participants could see it. Lunch component instruction posters were displayed. MENUS/ MEAL COMPONENTS: All meals observed with the exception of two breakfasts included all required components or items. Soy milk substitute offered met USDA Guidelines.

Site - Level Commendations EDISON ELEMENTARY (0445)

Description

BREAKFAST: The district has good breakfast participation. Grab and Go breakfast is provided until 10:00 a.m. The SFA is conscious of ensuring students are fed. Food service staff knows the majority of the students by name and interacts with students in a pleasant manor.

Fresh Fruit and Vegetable Program (FFVP): The school is on track to spend no more than 10% of it's total grant on administrative costs. Cost documentation was available to validate March 2017 claims for reimbursement. Cost documentation was very well organized. The FFVP produce invoices are separate from other school meal program food purchases. Time logs were available for both operating and administrative labor costs claimed. March FFVP menu was available. The menu also serves as the teachers FFVP snack order form. Teacher indicate which days and how many FFVP snacks will be needed and days when no FFVP is needed (field trips). This allows to decrease snack waste and use the grant dollars efficiently. The FFVP snacks are provided four days a week. A good variety of fruits and vegetables are provided. The SFA has excellent nutrition education materials from Pick A Better Snack through an Iowa Department of Public Health (IDPH) grant as well as a Children's Hospital and Medical Center grant. FFVP outreach is conducted through monthly newsletters which is printed on the back of the monthly menus and distributed to households as well as the online menu. Standard operating procedures for the FFVP are available. On day of observation, FFVP snacks were delivered in a clean truck from the SFA Nutrition Services warehouse at 9:00 a.m. The FFVP snacks arrive in single serve sealed plastic package. The packages are placed in clear rubbermaid totes labeled with each classroom teacher's name. The tote contained the nutrition education message for the day's snack. On the lid of the tote, is a sleeve with the month's menus. The totes were placed on a cart ready for distribution. Either student from the class or custodial staff deliver the totes to each classroom. The empty totes are returned to the Nutrition Services warehouse where they are washed and sanitized daily.

HACCP/FOOD SAFETY (1400): The latest Health Inspection Report was posted in a publicly visible location. Temperature logs are maintained for all coolers, including milk coolers and freezers. The kitchen and storage areas were orderly and clean, and all food in coolers and freezers were covered and clearly labeled. Food Service Staff took temperatures of food product and recorded the temperatures daily. Temperature logs were kept on file for a minimum of 6 months. Staff were friendly, and interacted well with students. Food Service Staff took temperatures of food product and recorded the temperatures daily. Temperature logs were kept on file for a minimum of 6 months.